

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas

FILED

January 16, 2025

Nathan Ochsner, Clerk of Court

United States of America

v.

Case No. M-25-00091-M

Ricardo Rodriguez, Jr

YOB: 1982

United States

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 15, 2025 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

USC Title 18 Section 1951

Interference with Commerce by Threats or Violence

This criminal complaint is based on these facts:

See attachment A

☒ Continued on the attached sheet.

Approved by AUSA R. Guerra

/s/ Ivan Garza

Complainant's signature

Ivan Garza , HSI Task Force Officer

Printed name and title☐ Sworn to telephonically and signed electronically
per Fed.R.Cr.4.1Date: 01/16/2025 at 5:19 p.m.City and state: McAllen, Texas*Judge's signature*

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On January 15, 2025, at approximately 2257 hrs. a member of the Texas Chicano Brotherhood Gang, Ricardo RODRIGUEZ, conducted an aggravated robbery at Total Entertainment in Roma, Texas. Total Entertainment is a gambling establishment which engages in commerce. The establishment was equipped with surveillance cameras which recorded the event.

RODRIGUEZ entered the establishment, brandished a pistol, and demanded money from the two employees present. Rodriguez moved toward an employee and grabbed her hair before pointed the pistol at her head. Rodriguez then went to a second employee and struck her on the head with the pistol. Immediately after being struck on the head, the second employee fell to the floor and hit her head on a gaming machine, causing pain/injury to her head. RODRIGUEZ then kicked the second employee while she was on the ground. RODRIGUEZ demanded "Give the money!"

RODRIGUEZ took U.S. currency from the second employee and from a money bag.



During the robbery, one of the customers was on the phone with a family member. The family member heard the robbery in progress and called the police. Officers from the Roma Police department arrived at the location, entered the establishment, and arrested RODRIGUEZ for aggravated robbery. Due to the robbery, Total Entertainment had to cease operations for the day which obstructed and delayed the business' ability to operate in commerce.

RODRIGUEZ was in possession of the pistol, which was later identified as an "air soft" replicate of a Beretta firearm, in his right rear pocket, and the stolen currency of approximately \$901.00 in U.S. currency. Rodriguez was still wearing a surgical mask and a black mask to conceal his face at the time of arrest. RODRIGUEZ was transported to the Roma Police Department.